

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-02865-LAK

This document relates to: The cases identified in
Appendix A.

DECLARATION OF ANDREW S. DULBERG

I, Andrew S. Dulberg, an attorney duly admitted to practice law in this court *pro hac vice*, hereby declare under penalty of perjury:

1. I am a partner at Wilmer Cutler Pickering Hale & Dorr, counsel for Richard and Jocelyn Markowitz, Avanix Management LLC Roth 401(K) Plan, Batavia Capital Pension Plan, Calypso Investments Pension Plan, Cavus Systems LLC Roth 401(K) Plan, Hadron Industries LLC Roth 401(K) Plan, RJM Capital Pension Plan, RJM Capital Pension Plan Trust, Routt Capital Pension Plan, and Routt Capital Trust in these actions. I am fully familiar with the matters set forth in this declaration.

2. I submit this declaration in connection with Defendants' Opposition to Plaintiffs' Motion for Issuance of a Request for International Judicial Assistance to Obtain Evidence in the United Kingdom.

3. Attached hereto as Exhibit A is a true and correct copy of the Bastion Capital London Ltd. Equities Trade Confirmation bearing the Bates stamp WH_MDL_00035240.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts of a West Point Derivatives Ltd. Statement for Hadron Industries LLC Roth 401(K) Plan bearing the Bates range WH_MDL_00055934 and WH_MDL_00055937 – WH_MDL_00055939.

5. Attached hereto as Exhibit C is a true and correct copy of excerpts of a Solo Capital Partners LLP Statement for Avanix Management LLC Roth 401(K) Plan bearing the Bates range WH_MDL_00089027 – WH_MDL_00089029.

6. Attached hereto as Exhibit D is a true and correct copy of excerpts of a Form TIC-S filed on behalf of Hadron Industries LLC Roth 401(K) Plan, dated March 31, 2015, bearing the Bates range WH_MDL_00190457 – WH_MDL_00190458.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 7, 2021
Boston, Massachusetts

/s/ Andrew S. Dulberg
Andrew S. Dulberg

APPENDIX A

Defendants	Counsel	Associated Case(s)
John van Merkensteijn, III	Sharon L. McCarthy Caroline Ciraolo Nicholas S. Bahnsen Kostelanetz & Fink LLP 7 World Trade Center, 34 th Floor New York, New York 10007 Tel: (212) 808-8100 Fax: (212) 808-8108 cciraolo@kflaw.com smccarthy@kflaw.com nbahnsen@kflaw.com	19-cv-01866 19-cv-01865 19-cv-01906 19-cv-01894 19-cv-01911 19-cv-01871 19-cv-01930 19-cv-01873 19-cv-01794 19-cv-01798 19-cv-01788 19-cv-01918 19-cv-01928 19-cv-01931 19-cv-01800 19-cv-01803 19-cv-01809 19-cv-01818 19-cv-01801 19-cv-01810 19-cv-01813
Elizabeth van Merkensteijn		19-cv-01893
Azalea Pension Plan		19-cv-01893
Basalt Ventures LLC Roth 401(K) Plan		19-cv-01866
Bernina Pension Plan		19-cv-01865
Bernina Pension Plan Trust		19-cv-10713
Michelle Investments Pension Plan		19-cv-01906
Omineca Pension Plan		19-cv-01894
Omineca Trust		19-cv-01794 19-cv-01798 19-cv-01788 19-cv-01918 19-cv-01928

Defendants	Counsel	Associated Case(s)
		19-cv-01931 19-cv-01800 19-cv-01803 19-cv-01809 19-cv-01818 19-cv-01801 19-cv-01810 19-cv-01813
Remece Investments LLC Pension Plan		19-cv-01911
Starfish Capital Management LLC Roth 401(K) Plan		19-cv-01871
Tarvos Pension Plan		19-cv-01930
Voojo Productions LLC Roth 401(K) Plan		19-cv-01873
Xiphias LLC Pension Plan		19-cv-01924
Richard Markowitz	Alan E. Schoenfeld Wilmer Cutler Pickering Hale and Dorr LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8800 alan.schoenfeld@wilmerhale.com	19-cv-01867 19-cv-01895 19-cv-01869 19-cv-01868 19-cv-01898 19-cv-10713 19-cv-01896 19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Jocelyn Markowitz		19-cv-01904
Avanix Management LLC Roth 401(K) Plan		19-cv-01867

Defendants	Counsel	Associated Case(s)
Batavia Capital Pension Plan Calypso Investments Pension Plan		19-cv-01895 19-cv-01904
Cavus Systems LLC Roth 401(K) Plan		19-cv-01869
Hadron Industries LLC Roth 401(K) Plan		19-cv-01868
RJM Capital Pension Plan		19-cv-01898
RJM Capital Pension Plan Trust		19-cv-10713
Routt Capital Pension Plan		19-cv-01896
Routt Capital Trust		19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Robert Klugman	Mark D. Allison Caplin & Drysdale, Chartered 600 Lexington Avenue 21 st Floor New York, NY 10022 Tel: (212) 379-6000 mallison@capdale.com zziering@capdale.com	18-cv-04434 18-cv-07824 18-cv-07827 18-cv-07828 18-cv-07829 19-cv-07829 19-cv-01783 19-cv-01785 19-cv-01788 19-cv-01791 19-cv-01792 19-cv-01798 19-cv-01800 19-cv-01801 19-cv-01803 19-cv-01806

Defendants	Counsel	Associated Case(s)
		19-cv-01808 19-cv-01809 19-cv-01810 19-cv-01812 19-cv-01813 19-cv-01815 19-cv-01818 19-cv-01870 19-cv-01918 19-cv-01922 19-cv-01926 19-cv-01928 19-cv-01929 19-cv-01931
RAK Investment Trust		18-cv-07828
Aerovane Logistics LLC Roth 401(K) Plan		18-cv-07827
Edgepoint Capital LLC Roth 401(K) Plan		18-cv-07824
Headsail Manufacturing LLC Roth 401(K) Plan		18-cv-07829
The Random Holdings 401(K) Plan		
The Stor Capital Consulting LLC 401(K) Plan		18-cv-04434
The Bradley London Pension Plan		18-cv-04047
The DMR Pension Plan		18-cv-04049
The Houston Rocco LLC 401K Plan		18-cv-04050
The Proper Pacific LLC 401K Plan		18-cv-04051
The LBR Capital Pension Plan		18-cv-04052

Defendants	Counsel	Associated Case(s)
The Atlantic DHR 401K Plan		18-cv-04430
The Busby Black 401K Plan		18-cv-04522
The Canada Rock LLC 401K Plan		18-cv-04531
The ISDB Pension Plan		18-cv-04536
The Monin Amper Pension Plan		18-cv-04538
The NYC Stanismore Pension Plan		18-cv-04541
The Texas Rocco LLC 401K Plan		18-cv-04543
Sanford Villa Pension Plan		18-cv-04767
The Aston Advisors LLC 401K Plan		18-cv-04770
The Sector 230 LLC 401K Plan		18-cv-04771
The M2F Wellness LLC 401K Plan		18-cv-04890
The MPQ Holdings LLC 401K Plan		18-cv-04892
The TKKJ LLC 401K Plan		18-cv-04896
NYCATX LLC Solo 401K Plan		18-cv-04898
Ackview Solo 401K Plan		18-cv-04900
The Dosmon Bly Pension Plan Doston		18-cv-05045
The India Bombay LLC 401K Pension Plan		18-cv-05057

Defendants	Counsel	Associated Case(s)
The Aria Pension Plan		18-cv-05147
The Belforte Pension Plan		18-cv-05150
The Bravos Advisors 401K Plan		18-cv-05151
The Costello Advisors Pension Plan		18-cv-05158
The Eskin Pension Plan		18-cv-05164
The Fieldcrest Pension Plan		18-cv-05180
The Westport Advisors LLC 401K Plan		18-cv-05183
The Kodiak Capital Pension Plan		18-cv-05185
The Kyber Pension Plan		18-cv-05186
The Lerici Capital Pension Plan		18-cv-05188
The Ludlow Holdings 401K Plan		18-cv-05189
The Regoleth Pension Plan		18-cv-05190
The Saba Capital LLC 401K Plan		18-cv-05192
The West River Pension Plan		18-cv-05193
The Stark Pension Plan		18-cv-05194
The Petkov Partners Pension Plan		18-cv-05299
The Petkov Management LLC 401K Plan		18-cv-05300
The SVP 401K Plan		18-cv-05305

Defendants	Counsel	Associated Case(s)
The Krabi Holdings LLC 401K Plan		18-cv-05307
The SPKK LLC 401K Plan		18-cv-05308
The KASV Group Pension Plan		18-cv-05309
The 78 Yorktown Pension Plan		18-cv-09565
The Cambridge Town Line Pension Plan		18-cv-09570
The Diamond Scott Capital Pension Plan		18-cv-09587
The Hotel Fromance Pension Plan		18-cv-09588
The Mountain Air LLC 401K Plan		18-cv-09589
The SKSL LLC Pension Plan		18-cv-09590
The Snow Hill Pension Plan		18-cv-09650
The Westridge Ave LLC 401K Plan		18-cv-09665
The Shapiro Blue Management LLC 401K Plan		18-cv-09666
The Patrick Partners Conglomerate Pension Plan		18-cv-09668
CSCC Capital Pension Plan		18-cv-09669
The Dink 14 LLC 401K Plan		18-cv-10091
JML Capital LLC 401K Plan		18-cv-10092
Natoli Management Pension Plan		18-cv-10093

Defendants	Counsel	Associated Case(s)
Nova Fonta Trading LLC 401K Plan		18-cv-10094
The Skybax LLC 401K Plan		18-cv-10095
The FWC Capital LLC Pension Plan		18-cv-10098
The RDL Consulting Group LLC Pension Plan		18-cv-10099
Cole Enterprises USA Retirement Plan Trust		18-cv-10118
Blackrain Pegasus LLC Solo 401K Plan		18-cv-10119
Gyos 23 LLC Solo 401K Plan		18-cv-10122
The Oak Tree One 401K Plan		18-cv-10123
The Joanne E. Bradley Solo 401K Plan		18-cv-10124
Delgado Fox LLC Solo 401K Plan		18-cv-10125
Pegasus Fox 23 LLC Solo 401K Plan		18-cv-10126
KK Law Firm Retirement Plan Trust		18-cv-10127
The Valerius LLC Solo 401K Plan		18-cv-10129
The Sinclair Pension Plan		18-cv-10133
The Green Group Site Pension Plan		18-cv-10134
The Mueller Investments Pension Plan		18-cv-10135

Defendants	Counsel	Associated Case(s)
The Bella Consultants Pension Plan		18-cv-10136
Blue Ocean Equity LLC Retirement Plan Trust		18-cv-10137
Doston Bradley		18-cv-04047 18-cv-04049 18-cv-04050 18-cv-04051 18-cv-04052 18-cv-04430 18-cv-04522 18-cv-04531 18-cv-04536 18-cv-04538 18-cv-04541 18-cv-04543 18-cv-05045 18-cv-05057 18-cv-10119 18-cv-10122 18-cv-10123 18-cv-10124 18-cv-10125 18-cv-10126
Roger Lehman		18-cv-04767 18-cv-04770 18-cv-05147 18-cv-05150 18-cv-05151 18-cv-05158 18-cv-05164 18-cv-05180 18-cv-05183 18-cv-05185 18-cv-05186 18-cv-05188 18-cv-05189 18-cv-05190 18-cv-05192 18-cv-05193 18-cv-05194 18-cv-05299

Defendants	Counsel	Associated Case(s)
		18-cv-05305 18-cv-05308 18-cv-05309 18-cv-09565 18-cv-09570 18-cv-09587 18-cv-09588 18-cv-09589 18-cv-09590 18-cv-09650 18-cv-09665 18-cv-09666 18-cv-09668 18-cv-09669 18-cv-10092 18-cv-10093 18-cv-10094 18-cv-10098 18-cv-10099 18-cv-10129 18-cv-10133 18-cv-10134 18-cv-10135 18-cv-10136
Mitchell Protass		18-cv-04890 18-cv-04892
Thomas Kertelits		18-cv-04896
Carl Andrew Vergari		18-cv-04898
Sean Driscoll		18-cv-04900
Gavin Crescenzo		18-cv-05147 18-cv-05150 18-cv-05151 18-cv-05158 18-cv-05164 18-cv-05180 18-cv-05183 18-cv-05185 18-cv-05186 18-cv-05188 18-cv-05189

Defendants	Counsel	Associated Case(s)
Bradley Crescenzo		18-cv-05190
		18-cv-05192
		18-cv-05193
		18-cv-05194
		18-cv-05307
		18-cv-05151
		18-cv-05185
		18-cv-05186
		18-cv-05190
		18-cv-05194
Svetlin Petkov		18-cv-10095
		18-cv-05299
		18-cv-05300
		18-cv-05305
		18-cv-05308
Vincent Natoli		18-cv-05309
		18-cv-10091
		18-cv-10093
John LaChance		18-cv-10094
		18-cv-10093
		18-cv-10093
Kevin Kenning		18-cv-10127
		18-cv-10137
		18-cv-10118
Todd Bergeron		18-cv-10118
		18-cv-10137
The Cardinal Consulting Pension Plan		18-cv-10028
The Egret Associates LLC 401K Plan		18-cv-10030
The Crow Associates Pension Plan		18-cv-10031
The Heron Advisors Pension Plan		18-cv-10032

Defendants	Counsel	Associated Case(s)
The Hoboken Advisors LLC 401K Plan		18-cv-10035
The Jayfran Blue Pension Plan		18-cv-10036
The JT Health Consulting LLC 401K Plan		18-cv-10039
The Lakeview Advisors 401K Plan		18-cv-10049
The Osprey Associates LLC 401K Plan		18-cv-10060
The Sandpiper Pension Plan		18-cv-10061
The Zen Training LLC 401(K) Plan		18-cv-10062
The Everything Clean LLC 401K Plan		18-cv-10063
The Jump Group LLC 401K Plan		18-cv-10064
The Oaks Group Pension Plan		18-cv-10065
The Wave Maven LLC 401K Plan		18-cv-10066
The Beech Tree Partners 401K Plan		18-cv-10069
The Blackbird 401K Plan		18-cv-10070
The Chambers Property Management LLC 401K Plan		18-cv-10071
FiftyEightSixty LLC Solo 401K Plan		18-cv-10073
The Hawk Group Pension Plan		18-cv-10074
The Hibiscus Partners LLC 401K Plan		18-cv-10076

Defendants	Counsel	Associated Case(s)
The Maple Advisors LLC 401K Plan		18-cv-10077
OneZeroFive LLC Solo 401K Plan		18-cv-10080
The Sea Bright Advisors LLC 401K Plan		18-cv-10082
The Tag Realty Advisors LLC 401K Plan		18-cv-10083
The Throckmorton Advisors 401K Plan		18-cv-10086
The Robin Daniel Pension Plan		18-cv-10096
Matthew Tucci		18-cv-10028 18-cv-10030 18-cv-10031 18-cv-10032 18-cv-10035 18-cv-10036 18-cv-10039 18-cv-10049 18-cv-10060 18-cv-10061 18-cv-10062 18-cv-10063 18-cv-10064 18-cv-10065 18-cv-10066 18-cv-10069 18-cv-10070 18-cv-10071 18-cv-10073 18-cv-10074 18-cv-10076 18-cv-10077 18-cv-10080 18-cv-10082 18-cv-10083 18-cv-10086 18-cv-10096

Defendants	Counsel	Associated Case(s)
Joseph Herman	Michelle A. Rice Kaplan Rice LLP 142 West 57 th Street Suite 4A New York N.Y. 10019 (212) 333-0227 mrice@kaplanrice.com	1:19-cv-01785
		1:19-cv-01781
		1:19-cv-01791
		1:19-cv-01794
David Zelman		1:19-cv-01918
		1:19-cv-01783
		1:19-cv-01798
		1:19-cv-01788
Edwin Miller		1:19-cv-01926
		1:19-cv-01922
		1:19-cv-01928
		1:19-cv-01929
		1:19-cv-01931
Ronald Altbach		1:19-cv-01809
		1:19-cv-01800
		1:19-cv-01803
		1:19-cv-01812
		1:19-cv-01818
Perry Lerner		1:19-cv-01806
		1:19-cv-01870
		1:19-cv-01792
		1:19-cv-01808
		1:19-cv-01815
Robin Jones		1:19-cv-01801
		1:19-cv-01810
		1:19-cv-01813
Ballast Ventures LLC Roth 401(K) Plan		1:19-cv-01781
Bareroot Capital Investments LLC Roth 401(K) Plan		1:19-cv-01783
Albedo Management LLC Roth 401(K) Plan		1:19-cv-01785
Dicot Technologies LLC Roth 401(K) Plan		1:19-cv-01788

Defendants	Counsel	Associated Case(s)
Fairlie Investments LLC Roth 401(K) Plan		1:19-cv-01791
First Ascent Worldwide LLC Roth 401(K) Plan		1:19-cv-01792
Battu Holdings LLC Roth 401(K) Plan		1:19-cv-01794
Cantata Industries LLC Roth 401(K) Plan		1:19-cv-01798
Crucible Ventures LLC Roth 401(K) Plan		1:19-cv-01800
Monomer Industries LLC Roth 401(K) Plan		1:19-cv-01801
Limelight Global Productions LLC Roth 401(K) Plan		1:19-cv-01803
Loggerhead Services LLC Roth 401(K) Plan		1:19-cv-01806
PAB Facilities Global LLC Roth 401(K) Plan		1:19-cv-01808
Plumrose Industries LLC Roth 401(K) Plan		1:19-cv-01809
Pinax Holdings LLC Roth 401(K) Plan		1:19-cv-01810
Roadcraft Technologies LLC Roth 401(K) Plan		1:19-cv-01812
Sternway Logistics LLC Roth 401(K) Plan		1:19-cv-01813
Trailing Edge Productions LLC Roth 401(K) Plan		1:19-cv-01815
True Wind Investments LLC Roth 401(K) Plan		1:19-cv-01818

Defendants	Counsel	Associated Case(s)
Eclouge Industry LLC Roth 401(K) Plan		1:19-cv-01870
Vanderlee Technologies Pension Plan		1:19-cv-01918
Vanderlee Technologies Pension Plan Trust		1:19-cv-01918
Cedar Hill Capital Investments LLC Roth 401(K) Plan		1:19-cv-01922
Green Scale Management LLC Roth 401(K) Plan		1:19-cv-01926
Fulcrum Productions LLC Roth 401(K) Plan		1:19-cv-01928
Keystone Technologies LLC Roth 401(K) Plan		1:19-cv-01929
Tumba Systems LLC Roth 401(K) Plan		1:19-cv-01931
Sander Gerber	Stephen D. Andrews Amy B. McKinlay Williams & Connolly LLP 725 Twelfth Street, N.W. Washington, DC 20005 (202) 434-5000 amckinlay@wc.com sandrews@wc.com	18-cv-4899
Sander Gerber Pension Plan		18-cv-4899
Michael Ben-Jacob	Thomas E. L. Dewey Dewey Pegno & Kramarsky LLP 777 Third Avenue – 37th Floor New York, New York 10017 Tel.: (212) 943-9000 Fax: (212) 943-4325 E-mail: tdewey@dpklaw.com	1:18-cv-04434 1:18-cv-07824 1:18-cv-07827 1:18-cv-07828 1:18-cv-07829 1:19-cv-01781 1:19-cv-01783 1:19-cv-01785 1:19-cv-01788 1:19-cv-01791 1:19-cv-01792 1:19-cv-01794 1:19-cv-01798 1:19-cv-01800

Defendants	Counsel	Associated Case(s)
		1:19-cv-01801 1:19-cv-01803 1:19-cv-01806 1:19-cv-01808 1:19-cv-01809 1:19-cv-01810 1:19-cv-01812 1:19-cv-01813 1:19-cv-01815 1:19-cv-01818 1:19-cv-01866 1:19-cv-01867 1:19-cv-01868 1:19-cv-01869 1:19-cv-01870 1:19-cv-01871 1:19-cv-01873 1:19-cv-01894 1:19-cv-01896 1:19-cv-01918 1:19-cv-01922 1:19-cv-01926 1:19-cv-01928 1:19-cv-01929 1:19-cv-01931

CERTIFICATE OF SERVICE

I certify that on April 7, 2021, I caused a true copy of the foregoing to be filed with the Clerk of the United States District Court for the Southern District of New York by using the Court's CM/ECF system. I further certify that Plaintiff is represented by attorneys who are registered CM/ECF users and that service will be accomplished by the CM/ECF system

April 7, 2021
Boston, MA

/s/ Andrew S. Dulberg

Andrew S. Dulberg

Exhibit A



Bastion Capital London Ltd Equities Trade Confirmation

Confirmation for client name:

Cavus Systems LLC Roth 401K Plan

Bastion Capital London has on your instructions arranged the following equities trade for you

Trade date:

7 August 2014

Stock:

TDC A/S

ISIN:

DK0060228559

Ticker:

TDC DC

Settlement date/ Stock purchase value date

13 August 2014

Transaction:

B/S	Volume	Price
B	3,691,977	51.35

Trade currency:

DKK

Arranging Broker

Patrick Milne

Arrangement fee:

DKK

2,369.79

Please notify any any errors or ommisions immediately to:

patrickmilne@bastioncapital.co.uk

27-32 Old Jewry

London EC2R 8DQ

Mobile: +44 (0) 7866774717

Telephone: +44 (0) 2076210924

www.bastioncapital.co.uk

Thank you for the trade

Exhibit B

Statement for Hadron Industries LLC Roth 401(K) Plan
(HAD01)

West Point Derivatives Ltd

01 January 2015 - 31 December 2015

Statement Summary

Hadron Industries LLC Roth 401(K) Plan
425 Park Avenue
New York
NY 10022
United States of America

	DKK	USD	EUR
Opening Cash Balance	0.00	0.00	0.00
Cash Equity Settlement (exc comm)	404,177,344.98	0.00	42,155.51
Brokerage On Execution	0.00	0.00	0.00
Clearing Charge	0.00	0.00	0.00
Exchange Fees on Futures	0.00	0.00	0.00
Cash Stock Loan Settlement	-404,177,344.98	0.00	-42,155.51
Total daily MTM on Stock Loan	404,177,344.98	0.00	42,155.51
Total Fees and Rebates	1,687,686.27	0.00	-25,861.29
Realised Forwards Profit & Loss	-466,936,722.22	0.00	-2,601,657.13
Realised Futures Profit & Loss	0.00	0.00	0.00
Initial Margin	0.00	0.00	0.00
Variation Margins	0.00	0.00	0.00
Dividend and Associated Taxes, Costs (TDC A/S 09/09/2015)	2,220,733.00	0.00	0.00
Dividend and Associated Taxes, Costs (UMICORE 30/04/2015)	0.00	0.00	32,617.12
Dividend and Associated Taxes, Costs (ACKERMANS & VAN HAAREN 01/02/2015)	0.00	0.00	30,521.40
Dividend and Associated Taxes, Costs (TDC A/S 10/09/2015)	600,573.52	0.00	0.00
Dividend and Associated Taxes, Costs (AP MOELLER-MÆRSK A/S-A 31/02/2015)	11,350,929.87	0.00	0.00
Dividend and Associated Taxes, Costs (DIETERN SANV 02/06/2015)	0.00	0.00	11,545.20

Equity Transactions

Trade Date	Settlement Date	Currency	Transaction Type	Counterparty	Description	Ticker	Nominal	Price	Amount	Balance
Denmark										
25/02/2015	02/03/2015	DKK	Buy	Boston Capital London Ltd	NOVOZYMES A/S-B	NZYM.B	887,944.00	322.5000	-221,861,940.00	-221,861,940.00
05/03/2015	10/03/2015	DKK	Buy	Sunrise Brokers	TDC A/S	TDC	3,042,100.00	54.0000	-164,273,430.00	-386,135,340.00
12/03/2015	17/03/2015	DKK	Buy	The T.J.M. Partnership P.L.C	DSV A/S	DSV	668,857.00	219.2000	-153,169,454.40	-539,324,784.40
19/03/2015	23/03/2015	DKK	Buy	Boston Capital London Ltd	PANDORA A/S	PNDORA	495,709.00	614.5000	-304,613,190.50	-843,937,974.90
19/03/2015	23/03/2015	DKK	Buy	Boston Capital London Ltd	Danske Bank A/S	DANSKE	3,560,940.00	175.3000	-630,684,192.00	-1,474,632,156.90
19/03/2015	24/03/2015	DKK	Buy	The T.J.M. Partnership P.L.C	GN STORE NORD A/S	GN D	590,564.00	154.2000	-92,452,789.30	-1,567,284,926.70
19/03/2015	24/03/2015	DKK	Buy	The T.J.M. Partnership P.L.C	NOVO NORDISK A/S-B	NOVOB	4,387,162.00	341.9000	-2,163,777,025.80	-3,751,026,451.50
25/03/2015	30/03/2015	DKK	Buy	Boston Capital London Ltd	TRYG A/S	TRYG	35,260.00	868.5000	-30,623,310.00	-3,781,686,761.50
29/03/2015	31/03/2015	DKK	Buy	Sunrise Brokers	CARLSBERG A/S-B	CARLB	180,298.00	571.5000	-103,040,307.00	-3,884,726,068.50
29/03/2015	31/03/2015	DKK	Buy	The T.J.M. Partnership P.L.C	FLSMIDTH & CO A/S	FLS	81,124.00	314.0000	-25,472,935.00	-3,910,199,004.50
30/03/2015	07/04/2015	DKK	Buy	The T.J.M. Partnership P.L.C	AP MOELLER-MAERSK A/S-B	MAERSKB	7,889.00	16,410.0000	-129,459,430.00	-4,039,657,464.50
30/03/2015	07/04/2015	DKK	Buy	Boston Capital London Ltd	VESTAS WIND SYSTEMS A/S	VWS	375,149.00	290.2000	-108,869,236.80	-4,148,525,724.30
30/03/2015	07/04/2015	DKK	Buy	The T.J.M. Partnership P.L.C	AP MOELLER-MAERSK A/S-A	MAERSKA	7,889.00	15,810.0000	-124,725,090.00	-4,273,250,824.30
09/05/2015	11/05/2015	DKK	Buy	Boston Capital London Ltd	COLOPLAST-B	COLOB	291,036.00	510.0000	-148,429,390.00	-4,421,679,184.30
12/05/2015	12/05/2015	DKK	Buy	Boston Capital London Ltd	TRYG A/S	TRYG	141,040.00	0.0000	0.00	-4,421,679,184.30
29/05/2015	29/05/2015	DKK	Sell	The T.J.M. Partnership P.L.C	NOVOZYMES A/S-B	NZYM.B	-687,944.00	313.3000	215,532,865.20	-4,206,146,329.10
27/05/2015	29/05/2015	DKK	Sell	Boston Capital London Ltd	TDC A/S	TDC	-3,042,100.00	48.8000	148,729,269.00	-4,057,418,060.10
29/05/2015	01/06/2015	DKK	Sell	The T.J.M. Partnership P.L.C	PANDORA A/S	PNDORA	-485,726.00	692.5000	343,279,482.50	-3,714,138,577.60
29/05/2015	01/06/2015	DKK	Sell	Sunrise Brokers	Danske Bank A/S	DANSKE	-3,598,940.00	200.7000	722,307,259.00	-2,991,832,316.60
11/06/2015	16/06/2015	DKK	Buy	The T.J.M. Partnership P.L.C	Auriga Industries A/S	AURIG	29,871.00	321.0000	-9,568,591.00	-3,001,420,910.60
19/06/2015	23/06/2015	DKK	Sell	Boston Capital London Ltd	AP MOELLER-MAERSK A/S-A	MAERSKA	-7,889.00	11,710.0000	92,390,190.00	-2,909,040,720.60
22/06/2015	24/06/2015	DKK	Sell	The T.J.M. Partnership P.L.C	TRYG A/S	TRYG	-176,300.00	138.9000	24,488,070.00	-2,884,552,650.60
22/06/2015	24/06/2015	DKK	Sell	The T.J.M. Partnership P.L.C	CARLSBERG A/S-B	CARLB	-180,298.00	618.0000	111,424,164.00	-2,773,128,486.60

22/06/2015	24/06/2015	DKK	Sel	The T.J.M Partnership P.L.C	VESTAS WIND SYSTEMS A/S	VWS	-375,146.00	331,9000	124,511,953.10	-2,646,616,533.50
22/06/2015	24/06/2015	DKK	Sel	Sunrise Brokers	FLSMITH & CO A/S	FLS	-81,124.00	340,2000	27,598,384.80	-2,621,018,148.70
30/06/2015	02/07/2015	DKK	Sel	Sunrise Brokers	COLOPLAST B	COLOB	-291,036.00	439,1000	121,793,907.60	-2,483,224,241.10
13/07/2015	15/07/2015	DKK	Sel	Bastion Capital London Ltd	Auriga Industries A/S	AURIB	-29,871.00	2,7700	67,807.17	-2,483,156,433.93
14/07/2015	16/07/2015	DKK	Sel	Sunrise Brokers	AP MOELLER-MAERSK A/S-B	MAERSKB	-7,889.00	11,910,0000	93,957,590.00	-2,396,198,443.93
17/07/2015	21/07/2015	DKK	Sel	Bastion Capital London Ltd	NOVO NORDISK A/S-B	NOVOB	-6,367,182.00	401,3000	2,563,176,136.60	163,977,682.67
17/07/2015	21/07/2015	DKK	Sel	Sunrise Brokers	DSV A/S	DSV	-698,857.00	237,2000	165,769,950.40	329,746,573.07
27/07/2015	29/07/2015	DKK	Sel	Bastion Capital London Ltd	GN STORE NORD A/S	GN D	-588,554.00	144,4000	86,577,041.60	416,323,614.67
07/08/2015	12/08/2015	DKK	Buy	Bastion Capital London Ltd	TDC A/S	TDC	1,097,224.00	48,2100	-52,697,169.34	363,426,446.63
22/08/2015	24/08/2015	DKK	Sel	Sunrise Brokers	TDC A/S	TDC	-1,097,224.00	37,1400	40,750,688.36	404,177,344.68
							0.00			404,177,344.68
Belgium										
21/04/2015	24/04/2015	EUR	Buy	Sunrise Brokers	Proximus	PROX	141,334.00	34,2560	-4,847,049.53	-4,847,046.53
23/04/2015	06/05/2015	EUR	Buy	The T.J.M Partnership P.L.C	UMICORE	UMI	86,076.00	44,6900	-3,954,487.31	-8,761,636.84
30/04/2015	06/05/2015	EUR	Buy	Bastion Capital London Ltd	LCB SA	LCB	128,851.00	64,3300	-8,274,832.32	-17,028,369.16
30/04/2015	06/05/2015	EUR	Buy	Sunrise Brokers	ANHUISER-BUUSCH INEUV NV	AB	792,267.00	108,9000	-86,277,876.30	-103,334,246.46
04/05/2015	07/05/2015	EUR	Buy	Sunrise Brokers	GROUPE BRUXELLES LAMBERT SA	GBLB	70,071.00	78,1100	-5,473,245.81	-108,777,497.27
05/05/2015	06/05/2015	EUR	Buy	The T.J.M Partnership P.L.C	BEFIMMO S.C.A.	BEFB	17,730.00	60,4500	-1,071,779.50	-109,846,268.77
05/05/2015	06/05/2015	EUR	Buy	The T.J.M Partnership P.L.C	AGEAS	AGS	207,665.00	32,7900	-6,869,335.35	-116,658,605.12
08/05/2015	13/05/2015	EUR	Buy	The T.J.M Partnership P.L.C	KBC GROEP NV	KBC	285,269.00	58,7800	-16,762,408.44	-133,421,011.56
14/05/2015	19/05/2015	EUR	Buy	Bastion Capital London Ltd	BEKAERT NV	BEKB	33,733.00	27,3400	-622,260.22	-134,343,271.78
14/05/2015	19/05/2015	EUR	Buy	Sunrise Brokers	SOLVAY SA	SOLB	56,376.00	126,6500	-7,140,400.35	-141,483,672.13
15/05/2015	20/05/2015	EUR	Buy	Sunrise Brokers	ipost SA	BPOST	99,562.00	25,1300	-2,501,990.06	-143,986,666.19
29/05/2015	03/06/2015	EUR	Buy	Bastion Capital London Ltd	ACKERMANS & VAN HAAREN	ACKB	22,360.00	124,4000	-2,761,394.00	-146,797,246.19
29/05/2015	03/06/2015	EUR	Buy	Bastion Capital London Ltd	ELIA SYSTEM OPERATOR SA/NV	ELI	29,107.00	39,6800	-1,149,289.90	-147,916,538.08

01/09/2015	04/09/2015	EUR	Buy	The TJM Partnership P.LC	DIETEREN SANV	DIE	19,242.00	36 1300	-685,213.46	-146,611,752.54
01/09/2015	04/09/2015	EUR	Buy	Bastion Capital London Ltd	DELHAIZE GROUP	DELB	106,406.00	81 2400	-8,644,423.44	-157,256,175.98
24/09/2015	26/09/2015	EUR	Sel	Bastion Capital London Ltd	GROUPE BRUXELLES LAMBERT SA	GBLB	-70,071.00	74 8100	5,242,011.51	-152,014,164.48
25/09/2015	26/09/2015	EUR	Sel	Bastion Capital London Ltd	Proximus	PROX	-141,334.00	32 5000	4,601,835.04	-147,412,329.44
29/09/2015	01/10/2015	EUR	Sel	The TJM Partnership P.LC	ANHEUSER-BUSCH INBEV NV	ABI	-792,297.00	109 1500	66,475,942.05	-60,939,366.36
29/09/2015	01/10/2015	EUR	Sel	The TJM Partnership P.LC	bpoc SA	BPOST	-66,662.00	24 6000	2,458,185.78	-58,479,200.60
29/09/2015	01/10/2015	EUR	Sel	Sunrise Brokers	AGEAS	AGS	-207,695.00	34 7900	7,222,588.70	-51,255,611.90
29/09/2015	01/10/2015	EUR	Sel	Sunrise Brokers	UCB SA	UCB	-128,651.00	65 3000	8,407,342.85	-42,849,269.06
02/10/2015	06/10/2015	EUR	Sel	The TJM Partnership P.LC	SOLVAY SA	SOLB	-56,378.00	124 1500	6,999,452.85	-35,848,816.20
02/10/2015	06/10/2015	EUR	Sel	The TJM Partnership P.LC	ELIA SYSTEM OPERATOR SANV	ELI	-26,107.00	36 6500	1,072,738.48	-34,779,077.72
03/10/2015	07/10/2015	EUR	Sel	Sunrise Brokers	KBC GROEP NV	KBC	-285,295.00	59 6800	17,081,937.72	-17,694,170.00
09/10/2015	10/10/2015	EUR	Sel	The TJM Partnership P.LC	BEVAERT NV	BEK6	-33,733.00	24 2000	818,025.25	-16,879,144.75
14/10/2015	16/10/2015	EUR	Sel	Sunrise Brokers	DELHAIZE GROUP	DELB	-109,406.00	78 3000	8,333,717.92	-8,542,426.83
20/10/2015	22/10/2015	EUR	Sel	Bastion Capital London Ltd	UMICORE	UMI	-66,978.00	42 9000	3,736,617.84	-4,805,606.99
24/10/2015	26/10/2015	EUR	Sel	The TJM Partnership P.LC	ACKERMANS & VAN HAAREN	ACK6	-22,360.00	141 3600	3,160,566.00	-1,645,222.99
03/09/2015	05/09/2015	EUR	Sel	Sunrise Brokers	BEFIMMO S.C.A.	BEFB	-17,730.00	58 0000	1,028,340.00	-610,682.89
09/09/2015	10/09/2015	EUR	Sel	Sunrise Brokers	DIETEREN SANV	DIE	-18,242.00	34 2500	659,039.50	42,155.51
							0.00			42,155.51

West Port Derivatives Ltd is a limited company incorporated under the laws of England and Wales and is authorised and regulated by the Financial Conduct Authority of the United Kingdom. Its registered office address is: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ. (FCA Registration Number 439667, Company Number 04903589)

We may receive remuneration from other parties in connection with any transaction and we may share any charges due to us with other parties. Details of which are available on written request. Where transactions involve the purchase of one currency with another the rate of exchange will be supplied when the currency has been purchased. The times of trades undertaken are available on written request. Optional deposits, premiums and margins as incurred are to be paid to us on demand. In the event of default of this condition we reserve the right of closing transactions without further notice and any loss resulting shall be immediately refunded to us by you. Any discrepancies should be notified to West Port Derivatives Ltd immediately by telephone and in writing. ISSUED SUBJECT TO ARTICLES AND RULES, CUSTOMS AND USAGES OF THE CLEARING HOUSE AND CORRECTION OF ERRORS AND OMISSIONS.

Exhibit C

Statement for AvaniX Management LLC Roth 401(K) (AVA01)

01 January 2015 - 31 December 2015

Statement Summary

AvaniX Management LLC Roth 401(K)
425 Park Avenue
New York,
NY 10022
United States of America

Solo Capital Partners LLP

	DKK	EUR	USD
Opening Cash Balance	0.00	0.00	0.00
Cash Equity Settlement (acc comm)	-124,290,986.33	10,798,905.39	0.00
Brokerage On Execution	0.00	0.00	0.00
Closing Charge	0.00	0.00	0.00
Exchange Fee on Futures	0.00	0.00	0.00
Cash Stock Loan Settlement	124,290,986.33	-10,798,905.39	0.00
Total daily MTM on Stock Loan	-124,290,986.33	10,798,905.39	0.00
Total Fee and Relative	2,016,927.78	-124,805.96	0.00
Realised Forwards Profit & Loss	-68,750,370.29	-23,600,596.53	0.00
Realised Futures Profit & Loss	0.00	0.00	0.00
Initial Margin	0.00	0.00	0.00
Variation Margins	0.00	0.00	0.00
Dividend and Associated Taxes, Costs (TDC A/S)	1,938,347.10	0.00	0.00
Dividend and Associated Taxes, Costs (UMICORE)	0.00	185,897.88	0.00
Dividend and Associated Taxes, Costs (ACKERMANS & VAN HAAREN)	0.00	185,718.11	0.00
Dividend and Associated Taxes, Costs (TDC A/S)	1,938,347.10	0.00	0.00
Dividend and Associated Taxes, Costs (AP MOELLERMAERSK A/S-A)	56,798,253.08	0.00	0.00
Dividend and Associated Taxes, Costs (DIETIEN SANV)	0.00	57,489.00	0.00
Dividend and Associated Taxes, Costs (BEFIMMO S.C.A.)	0.00	57,933.92	0.00

Dividend and Associated Taxes, Coats (BECKERT NV)	0.00	108,433.01	0.00
Dividend and Associated Taxes, Coats (ANHEUSER-BUSCH INBEV NV)	0.00	5,915,934.00	0.00
Dividend and Associated Taxes, Coats (KBC GROEP NV)	0.00	2,160,223.50	0.00
Dividend and Associated Taxes, Coats (ppear SA)	0.00	85,298.88	0.00
Dividend and Associated Taxes, Coats (NOVOZYMES A/S-B)	1,716,900.87	0.00	0.00
Dividend and Associated Taxes, Coats (PANDORA A/S)	2,644,133.29	0.00	0.00
Dividend and Associated Taxes, Coats (ELIA SYSTEM OPERATOR SA/NV)	0.00	198,592.59	0.00
Dividend and Associated Taxes, Coats (Unknown)	5,320,208.80	0.00	0.00
Dividend and Associated Taxes, Coats (Auriga Industries A/S)	35,754,724.02	0.00	0.00
Dividend and Associated Taxes, Coats (SOLVAY SA)	0.00	440,241.20	0.00
Dividend and Associated Taxes, Coats (COLPLAST B)	4,766,915.14	0.00	0.00
Dividend and Associated Taxes, Coats (TRYG A/S)	3,760,901.42	0.00	0.00
Dividend and Associated Taxes, Coats (Danish Bank A/S)	12,614,796.71	0.00	0.00
Dividend and Associated Taxes, Coats (Prothrus)	0.00	553,483.26	0.00
Dividend and Associated Taxes, Coats (GROUPE BRUXELLES LAMBERT SA)	0.00	732,511.01	0.00
Dividend and Associated Taxes, Coats (UCB SA)	0.00	509,694.75	0.00
Dividend and Associated Taxes, Coats (DELHAIZE GROUP)	0.00	696,640.80	0.00
Dividend and Associated Taxes, Coats (NOVO NORDISK A/S-B)	21,636,480.95	0.00	0.00
Dividend and Associated Taxes, Coats (DSV A/S)	691,039.89	0.00	0.00
Dividend and Associated Taxes, Coats (FLSMIDTH & CO A/S)	2,837,211.14	0.00	0.00
Dividend and Associated Taxes, Coats (AP MOELLER-MAERSK A/S-B)	57,361,805.61	0.00	0.00
Dividend and Associated Taxes, Coats (AGEAS)	0.00	1,219,390.20	0.00
Dividend and Associated Taxes, Coats (GM STORE NORD A/S)	365,592.39	0.00	0.00
Dividend and Associated Taxes, Coats (CARL SBERG AS-B)	5,885,342.51	0.00	0.00
Cash Payment/Receipts	0.00	0.00	0.00
Total Cash Balance	0.00	0.00	0.00

SOLO CAPITAL PARTNERS LLP is a company incorporated and registered in England & Wales and is authorised and regulated by the Financial Conduct Authority of the United Kingdom. (FCA Registration Number 565533, Company Registration Number 06387879, VAT Registration Number 123 9453 46)
We may receive remuneration from other parties in connection with any transaction and we may share any charges due to us with other parties, details of which are available on written request. Where transactions involve the purchase of one currency with another the rate of exchange will be supplied when the currency has been purchased. The times of trades undertaken are available on written request. Original deposits, premiums and margins all incurred are to be sold to us on demand. In the event of default of this condition we reserve the right of closing transactions without further notice and any loss resulting shall be immediately refunded to us by you. Any discrepancies should be notified Solo Capital Partners LLP immediately by telephone and in writing. ISSUED SUBJECT TO ARTICLES AND RULES, CUSTOMS AND USAGES OF THE EXCHANGE AND THE CLEARING HOUSE AND CORRECTION OF ERRORS AND OMISSIONS.

Exhibit D

MONTHLY REPORT TO FEDERAL RESERVE BANKS**FORM S**

**PURCHASES AND SALES
OF LONG-TERM SECURITIES
BY FOREIGN-RESIDENTS**

Please type or print:

Name of Reporting Entity:

Hadron Industries LLC Roth 401(K) Plan

ID Number:

4846541

As-of Date:

March 31, 2015

Name of Contact if We Have
Questions:

Michael Ben-Jacob

Contact's Phone Number:

212-836-8310

Name and Title of Officer Authorized
to Sign Report:

Michael Ben Jacob, Authorized Person

Please read carefully and sign below:

I, Michael Ben Jacob
(Signature of Officer Authorized to Sign Report)
of the reporting institution do hereby
declare that the Treasury International
Capital S Report for this report date
has been prepared in conformance
with the instructions and is true to the
best of my knowledge and belief.

Legal basis and confidentiality statement:

This report is required by law (22 U.S.C. 286f; 22 U.S.C. 3103; E.O. 11961; E.O. 10033; 31 C.F.R. 128.1 (a)). Failure to report can result in a civil penalty of not less than \$2,500 and not more than \$25,000. Willful failure to report can result in criminal prosecution and upon conviction a fine of not more than \$10,000; and, if an individual, imprisonment for not more than one year, or both. Any officer, director, employee, or agent of any corporation who knowingly participates in such violation may, upon conviction, be punished by a fine, imprisonment, or both (22 U.S.C. 3105 (a), (b), and (c); 31 C.F.R. 128.4 (a) and (b)).

Data reported on these forms will be held in confidence by the Department of the Treasury, the Board of Governors of the Federal Reserve System, and the Federal Reserve Banks acting as fiscal agents for the Treasury. The data reported by individual respondents will not be published or otherwise publicly disclosed; information may be given to other Federal agencies, insofar as authorized by applicable law (44 U.S.C. 3501 et seq.; 22 U.S.C. 3101 et seq.). Aggregate data derived from reports on these forms may be published or otherwise disclosed only in a manner that will not reveal the amounts reported by any individual respondent.

Note: No person is required to respond to any U.S. Government collection of information unless the form displays a currently valid control number assigned by the Office of Management and Budget (OMB).

DEPARTMENT OF THE TREASURY

Office of the Assistant Secretary for
International AffairsRevised December 2013
Approval expires June 30, 2017
OMB Control 1505-0001Important Notes:

1. Before preparing this report, please read the General and Specific Instructions carefully.
2. Additional copies of this form, the instructions, and the answers to Frequently Asked Questions can be obtained at our web site:
<http://www.treasury.gov/resource-center/data-chart-center/tic/Pages/forms.aspx>
3. This report is due no later than the fifteenth calendar day following the last day of the month.
4. Amounts should be reported in millions of U.S. dollars as of the close of the last business day of the month.

[illegible]